

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JIANLIANG ZHU and JOYCE ALLEN, *on behalf
of themselves and all others similarly situated,*

Plaintiffs,

v.

CIGNA CORPORATION; CONNECTICUT
GENERAL LIFE INSURANCE COMPANY;
CIGNA HEALTH AND LIFE INSURANCE
COMPANY; AMERICAN SPECIALTY
HEALTH INCORPORATED; and AMERICAN
SPECIALTY HEALTH GROUP, INC.,

Defendants.

Case No. 2:18-cv-02927-NIQA

**JOINT MOTION TO STAY PENDING CONSOLIDATION WITH RELATED ACTIONS
UPON PRELIMINARY APPROVAL OF SETTLEMENT**

The parties respectfully and jointly request that the Court enter the proposed order attached as Exhibit A, under which this action will be (i) stayed pending the Court's ruling on preliminary approval of the parties' settlement and (ii) consolidated with related actions if the Court grants preliminary approval. As further support for this request, the parties state as follows.

On September 14, 2018, Defendants filed motions to dismiss in this action. Those motions remain pending and have not yet been fully briefed.

Plaintiffs Jianliang Zhu and Joyce Allen, Defendants, and plaintiffs in the related actions captioned *Lietz v. Cigna Corp.*, Case No. 2:16-03967-NIQA (E.D. Pa.) (the "*Lietz* Action"), and *Kilroy v. Cigna Corp.*, Case No. 2:18-cv-01557-NIQA (the "*Kilroy* Action") have now reached a settlement resolving this action, the *Lietz* Action, and the *Kilroy* Action. On March 26, 2019,

Mr. Zhu, Ms. Allen, and the plaintiffs in the *Lietz* and *Kilroy* Actions filed a motion in the *Lietz* Action (Case No. 2:16-03967-NIQA, ECF No. 86) for preliminary approval of the settlement.

To facilitate the preliminary approval and settlement process, Ms. Kilroy and Defendants hereby request that the Court enter the proposed order attached as Exhibit A, which provides as follows:

1. This action is hereby stayed pending the Court's ruling on the preliminary approval motion filed in the *Lietz* Action (Case No. 2:16-03967-NIQA, ECF No. 86); and
2. Upon preliminary approval of the settlement filed in the *Lietz* Action, without further order of the Court, this action will hereby be consolidated with the *Lietz* Action and *Kilroy* Action, under the caption *In re Cigna-American Specialty Health Administrative Fee Litigation*, Case No. 2:16-cv-03697-NIQA, and the proposed Consolidated Class Action Complaint attached as Exhibit 1 to the parties' settlement agreement as filed in the *Lietz* Action (Case No. 2:16-03967-NIQA, ECF No. 87-001) shall be deemed to be the operative complaint in the consolidated action.

Dated: March 27, 2019

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Respectfully submitted,

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